

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

IN THE MATTER OF THE SEARCH OF

INFORMATION ASSOCIATED WITH:

A WHITE **2020 GRAND JEEP CHEROKEE**, WITH

REPORTED VIN OF **1C4RJFBG1LC115808**,

PENNSYLVANIA REGISTRATION **LJM8138**

Magistrate No. 20-2411

[Under Seal]

**AFFIDAVIT IN SUPPORT OF**

**AN APPLICATION FOR SEARCH WARRANT**

I, Ryan Melder, being first duly sworn, hereby depose and state as follows:

**INTRODUCTION AND AGENT BACKGROUND**

1. I make this affidavit in support of an application for a search warrant for evidence associated with what is believed to be a stolen vehicle. This vehicle is described as a white 2020 Jeep Grand Cherokee, bearing reported VIN of **1C4RJFBG1LC115808**, and Pennsylvania Registration LJM8138 (hereinafter referred to as “**Target Vehicle**.” The evidentiary items to be searched and seized are further described in Attachments A and B. The **Target Vehicle** is currently secured by the Sharon Police Department subsequent to a traffic stop that occurred on November 14, 2020.
2. I am a Special Agent with the Federal Bureau of Investigation and have been since May 2017. Prior to becoming an FBI Special Agent, I was employed with the FBI as a Staff Operations Specialist in Washington D.C. and as a Surveillance Specialist in New York, New York since December 2012. I am currently assigned to the Pittsburgh Field Office,

where the FBI and members of the Pennsylvania State Police Western Regional Auto Theft Task Force (“WRATTTF”) are investigating the matters described below. Through the course of my training and experience, your Affiant has come to know that Vehicle Identification Numbers (VINs) are unique to each motor vehicle and are often altered or changed by thieves when the vehicle has been stolen or obtained by fraud. Through my training and experience as an FBI Special Agent, I have learned that it is common for the vehicle thieves to dismantle, chop up, and cut vehicles and vehicle part(s), and to destroy VINs in order to prevent the stolen vehicle’s identification by law enforcement and victims. Through my training and experience, I know how to search vehicles in order to identify a true VIN compared to a fraudulent or altered VIN.

3. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other agents and witnesses involved in this investigation. This affidavit is intended to show merely that there is sufficient probable cause for the requested warrant and does not set forth all of my knowledge about this matter.
4. Based on the facts set forth in this affidavit, there is probable cause to believe that violations of 18 U.S.C. Sections 371 (conspiracy), and 2312 (interstate transportation of stolen motor vehicles) have been committed by Kayla Marie Knight (hereinafter referred to as “KNIGHT”) and other persons not yet identified. There is also probable cause to search the items described in Attachment A for evidence of these crimes as further described in Attachment B.

#### **PROBABLE CAUSE**

5. The FBI is working with WRATTTF in the investigation and prosecution of crimes associated with organized thefts of property, vehicles, heavy equipment, landscaping

equipment and all-terrain vehicles. The investigations include an incident involving the theft of a vehicle, possibly in or around the District of Columbia, and transportation of that stolen vehicle to Sharon, Pennsylvania, as set forth in more detail below.

6. In late October 2020, Investigators received a National Insurance Crime Bureau Data Analytics Vehicle Lead report. The report related to the **Target Vehicle**, which had been titled and registered to KNIGHT on 06/20/2020. When the vehicle was titled and registered to KNIGHT on 06/20/2020, the reported mileage was 11,397 miles.
7. The National Insurance Crime Bureau (“NICB”) is an organization which consists of numerous entities within the insurance industry. One of NICB’s functions is to investigate frauds and thefts which victimize its members, including suspected thefts and frauds involving vehicles. NICB works with multiple partners, one of which is CARFAX. When a vehicle title transfer occurs in Pennsylvania, the transfer of ownership is captured by CARFAX. When CARFAX identifies a suspicious vehicle, CARFAX sends a notification to NICB, which then does its own independent investigation.
8. The **Target Vehicle** came to the attention of NICB, through CARFAX, when the vehicle was registered in the state of Pennsylvania to KNIGHT on 06/20/2020. The reported starting mileage of 11,397 with no prior ownership of the vehicle, raised suspicion at NICB that this vehicle was stolen, or involved in some type of titling fraud. All vehicles have a tracking history originating with an initial sale from a car dealership. The fact that the **Target Vehicle** contained high mileage without a history of sale caused NICB to generate the above referenced Vehicle Lead Report and send it to the WRATTF.
9. An independent CARFAX inquiry was conducted on the Target Vehicle in November 2020 by the WRATTF. That inquiry revealed that the Target Vehicle most likely is a

stolen vehicle, with a fraudulent VIN, because without an existing previous sale history, the vehicle mileage can't be 11,397.

10. During NICB's independent investigation, they reached out to Fiat Chrysler Automobiles (FCA) to check the reported VIN of the **Target Vehicle**. FCA owns JEEP and tracks all the VINS that have been produced on JEEP vehicles. FCA advised the NICB that the VIN 1C4RJFBG1LC115808 on the **Target Vehicle** is not valid. These events are documented on the CARFAX Vehicle History report and the NICB Data Analytics Vehicle Lead report for the VIN listed above.
11. The records of the Pennsylvania Department of Motor Vehicles show that, when KNIGHT registered and titled the **Target Vehicle** in Pennsylvania, she presented a purportedly legitimate District of Columbia title bearing title number K568644 for the title transfer transaction. However, our investigation has revealed that the District of Columbia's vehicle records show that title number K568644 is linked to a 1995 Mercedes. Those records also reveal that the **Target Vehicle's** purported VIN, 1C4RJFBG1LC115808, has never been registered with any vehicle in the District of Columbia. Finally, the name "Hector Lionel Spriggs", which is the name on the District of Columbia titled presented by KNIGHT, also does not exist within the District of Columbia's records. For the reasons listed above, the WRATTF entered the Target Vehicle into the National Crime Information Center (NCIC) database as stolen.
12. On November 14, 2020 KNIGHT was stopped by Sharon Police in Mercer County, Pennsylvania while operating the **Target Vehicle**, as the Sharon Police suspected that the car was stolen, as reflected in NCIC. KNIGHT told Officer Cunningham of the Sharon Police Department that she had purchased the **Target Vehicle** from "a guy in the District

of Columbia who was going to jail.” KNIGHT claimed to have paid \$45,000 cash for the **Target Vehicle**. When Officer Cunningham looked at the Target Vehicle’s purported VIN, which was visible in plain view through the lower left portion of the windshield, he noted that the displayed VIN was the above described invalid VIN 1C4RJFBG1LC115808. Accordingly, the Sharon Police seized the vehicle and contacted investigators from the WRATTF. The **Target Vehicle** was seized by the WRATTF and towed to a secure facility in Allegheny County, Pennsylvania.

13. In August of 2020, Roy Jones, who is from Woodbridge, Virginia, was arrested by the Baltimore Regional Auto Theft Task Force for suspected auto theft. Jones is suspected to be the leader of a large auto theft operation. Following his arrest, Jones’ telephone was searched by investigators. The search of Jones’ phone revealed conversations between Knight and Jones wherein Jones was asking Knight to get rid of cars for Jones.
14. Based on (a) the lack of a verifiable vehicle history associated with the Target Vehicle, (b) the false information in the displayed VIN and vehicle title and registration records, (c) KNIGHT’s claim that she had paid \$45,000 in cash to a guy who was going to jail, (d) the information in Jones’ phone linking him to Knight for the disposition of vehicles, there is probable cause to believe that this vehicle has been stolen and has been transported to Pennsylvania from either the District of Columbia, Maryland, or Virginia. Your Affiant and other Investigators want to examine the **Target Vehicle** to determine the Target Vehicle’s true identity, and thereby determine the theft and/or fraud history of the Target Vehicle. Investigators know that VINs are often physically altered or changed after the true vehicle has been stolen or have been reported stolen by the owners in an insurance fraud attempt. In order to determine the true VIN of the target vehicle, your

Affiant, and/or other members of the WRATTF, will examine a secondary VIN location, which is hidden on the Target Vehicle and not known to the public. This examination will provide confirmation of the vehicle's true VIN, which will enable us to identify the victim(s) of the theft and/or fraud, and provide us with leads as to the persons involved in these offenses.

**AUTHORIZATION REQUEST**

15. Based on the foregoing, I request that the Court issue the proposed search warrant pursuant to Federal Rule of Criminal Procedure 41.
16. I further request that the Court order that all papers in support of this application, including the affidavit and search warrant, be sealed until further order of the Court. These documents discuss an ongoing criminal investigation that is neither public nor known to all of the targets of the investigation. Accordingly, there is good cause to seal these documents because their premature disclosure may seriously jeopardize that investigation, including by giving targets an opportunity to destroy or tamper with evidence, change patterns of behavior, notify confederates, and flee from prosecution.

Respectfully Submitted,

/s/Ryan Melder  
Ryan Melder, SA, FBI

Subscribed and sworn to before  
me on December 2, 2020



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HONORABLE LISA P. LENIHAN  
UNITED STATES MAGISTRATE JUDGE

**ATTACHMENT A**

**Property to Be Searched**

A 2020 Jeep Grand Cherokee, bearing reported VIN of **1C4RJFBG1LC115808**, and Pennsylvania Registration LJM8138, currently secured by the Pennsylvania State Police Western Regional Auto Theft Task Force in Allegheny County, Pennsylvania.

**ATTACHMENT B**

**I. Items to be seized from within the vehicle:**

1. DOCUMENTS (any and all paperwork) regarding:
  - a. Vehicle Titles
  - b. Vehicle registrations
  - c. Vehicle purchase receipts
  - d. Ownership History
  - e. Bank Statements
  - f. Banking records associated with the acquisition of all vehicles
2. Vehicle keys
3. Any additional items which may contain DNA and/or fingerprints found upon forensic processing.

**II. Information to be Seized by the Government**

All information described above in Section I that constitutes evidence, fruits, contraband, and instrumentalities of violations of 18 U.S.C. §§ 371, and 2312 involving KNIGHT, and others not yet identified.